UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK IN RE WORLD TRADE CENTER 21MC102(AKH) LOWER MANHATTAN DISASTER SITE LITIGATION JAIRO ZAMORA, (AND WIFE, GLORIA ZAMORA), 08CV2741(AKH) Plaintiff(s), NOTICE OF ADOPTION BY MAYORE ESTATES LLC, 80 -against-LAFAYETTE ASSOCIATES LLC, MAYORE ESTATES 100 CHURCH LLC, et al., LLC, and 80 LAFAYETTE ASSOCIATION LLC, AS Defendants. **TENANTS IN COMMON OF** ANSWER TO MASTER

**COMPLAINT** 

PLEASE TAKE NOTICE that defendant NOTICE OF ADOPTION BY MAYORE ESTATES LLC, 80 LAFAYETTE ASSOCIATES LLC, MAYORE ESTATES LLC, and 80 LAFAYETTE ASSOCIATION LLC, AS TENANTS IN COMMON for the building located at 22 Cortlandt Street (Subcellar Floors 1, 2, 3, and Floors 1, 2, 3) New York, New York 10007, (hereinafter "Mayore Estates/80 Lafayette") as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint adding new defendants not previously served filed in the above-referenced action, herein adopts Mayore Estates/80 Lafayette's Answer to Master Complaint dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). MAYORE ESTATES/80 LAFAYETTE has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

PLEASE TAKE FURTHER NOTICE THAT defendant, Mayore Estates/80 Lafayette reserves its right to assert any defenses to which it is entitled, including but not limited to those enumerated in Case Management Order No. 4 (¶¶ D(1)-(5)).

WHEREFORE, Mayore Estates/80 Lafayette demands judgment dismissing the abovecaptioned action as against it, together with its costs and disbursements.

Dated: New York, New York May 3, 2008

## HARRIS BEACH PLLC

Attorneys for Defendant MAYORE ESTATES LLC, 80 LAFAYETTE ASSOCIATES LLC, MAYORE ESTATES LLC, and 80 LAFAYETTE ASSOCIATION LLC, AS TENANTS IN COMMON

/s/Stanley Goos, Esq. (SG 7062) 100 Wall Street, 23<sup>rd</sup> Floor New York, New York 10005 (212) 687-0100

TO:

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Patton Boggs LLP One Riverfront Plaza, 6<sup>th</sup> Floor Newark, New Jersey 07102 *Liaison Counsel for the Defendants* 

**All Counsel via ECF** 

## **CERTIFICATION AS TO SERVICE**

The undersigned certifies that on May 3, 2008, I caused to be filed and served the following document electronically via the Court's ECF system upon the parties:

1. Notice of Adoption by Mayore Estates LLC, 80 Lafayette Associates LLC, Mayore Estates LLC, And 80 Lafayette Association LLC, as Tenants in Common of Answer to Master Complaint.

Dated: May 3, 2008

Stanley Goos, Esq. (SG 7062)